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March 20, 2009

Via Hand Delivery

Mr. Stephen Gardner, Project Manager Loudoun County Department of Planning 1 Harrison Street, SE, Third Floor Leesburg, VA 20177



Re: Washington Immanuel Presbyterian Church Special Exception Application (SPEX 2007-0053) Referral Response Letter

Dear Mr. Gardner:

Washington Immanuel Presbyterian Church (hereinafter the "Applicant") provides this letter as a written response to the referral agency comments in the above referenced application. For your convenience, each of the Staff comments are stated below and the Applicant's responses follow in bold italics.

<u>LOUDOUN COUNTY DEPARTMENT OF PLANNING, COMMUNITY PLANNING (Pat Giglio, Planner, 2/25/08)</u>

BACKGROUND

The applicant, Washington Immanuel Presbyterian Church, is requesting a Special Exception to permit a church use within an existing building located at 23219 Evergreen Mills Road. The 10 acre subject property is located on the west side of Evergreen Mills Road (Route 621) approximately one-half mile south of the intersection of Ryan Road, near Brambleton and the village of Arcola. The one-story metal Morton building was originally constructed as an agricultural processing/distribution facility, the property was later sold in 2003 to Elks Lodge #2406, located in Sterling, who never officially occupied the building. The applicant is proposing to convert the 10,646 square foot building into a 250-seat assembly area for church services. The proposed church would be served by an on-site well and the applicant has requested a permanent pump-and-haul operation for the wastewater generated by the use. The applicant is also proposing the

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abandonment of the current entrance and its relocation to the east, as well as the provision of additional parking. The subject site is zoned A3 (Agriculture Residential) and governed under the provisions of the Revised 1993 Zoning Ordinance. A review of County GIS records did not identify any environmental features on the site that would be impacted by the use of the existing building, relocation of the entrance and expansion of the parking area.

COMPREHENSIVE PLAN COMPLIANCE

The subject property is governed under the policies of the <u>Revised General Plan</u>. The <u>Revised General Plan</u> places the property within the northern tier of the Rural Policy Area. The area is planned for rural economy uses and limited residential development (<u>Revised General Plan</u>, Policy 3, p.7-15).

ANALYSIS

A. LAND USE

The preservation and enhancement of the rural economy is a central focus of the rural strategy. The Plan identifies a variety of appropriate rural commercial, industrial, employment, and **institutional** [emphasis added] activities that preserve the rural character and are compatible with the dominant rural land-use pattern in the Rural Policy Area (*Revised General Plan, Policy 6, p. 7-8*). The proposed use of the subject property and the existing buildings for an institutional use, a church, is in conformance with land uses prescribed by the <u>Revised General Plan</u> for the Rural Policy Area. However, significant water and wastewater, parking, landscaping and buffering issues remain and are discussed in depth below.

Staff finds that the proposed use of the subject property for a church is consistent with the planned land use for the area and is supported by the rural policies of the Revised General Plan.

Applicant Response:

The Applicant concurs with this statement.

B. COMPATIBILITY

Plan policies support the development of rural use that are compatible in scale, use and intensity with the rural environment. Plan policies state that rural uses should meet "established performance criteria, including traffic capacity limits, employee limits, site design standards (i.e. buffering, use intensity, siting, architectural features) and pose no threat to public health, safety and welfare" (Revised General Plan, Policy 6, p.7-8).

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Where possible such uses should locate in existing historic and/or historic agricultural structures (*Revised General Plan*, *Policy 6*, *p.7-8*).

Water and Wastewater

The Statement of Justification indicates that the property is presently served by a private well and a sewage disposal system comprised of a pump-and-haul tank. The applicant proposes to conduct a study to determine if the existing well meets current standards and to apply for a separate permit for a permanent pump-and-haul. The Revised General Plan states that pump-and-haul operations are not permitted in the Rural Policy Area except as a last resort and temporary wastewater disposal method to address a proven, public health emergency. The County will determine the length of the period during which pump-and-haul disposal will be allowed (Revised General Plan, Policy 12, p.2-22). To date the applicant has not applied to the County for a pump-and-haul permit for the proposed use.

Plan policies do not support permanent pump-and-haul operations within the Rural Policy Area; however the applicant may apply for a permanent pump-and-haul application which will be evaluated by the Health Department and LCSA prior to final action by the Board of Supervisors. Resolution of this major issue, prior to moving forward on the legislative application will determine if the utilization of the subject property for the proposed church is viable or if other uses for the property should be considered.

Applicant Response:

The Applicant has worked with the Health Department over the past several months and has received an approved extension of the existing temporary pump and haul permit that was first issued in 1998. The approved pump and haul system will more than sufficiently serve the proposed church's wastewater needs. The approved extension of the temporary pump and haul permit is enclosed as part of this referral response package.

Traffic

The proposed site is accessed from Evergreen Mills Road (Route 621) which is currently designated as a major collector in the Revised Countywide Transportation Plan. A traffic impact analysis was submitted with this application to the Office of Transportation Services. The traffic study is based on the anticipated traffic generation for the use of the subject site as a church with a capacity for 250 people and providing Sunday only services. The traffic study anticipated that at full building-out the proposed church would ultimately generate 8 am peak hour trips, 7 pm peak hour trips, and 164 Sunday peak hour trips. The applicant has proposed the abandonment of the current

entrance and its relocation to the east to improve site distances. The new entrance will include a right turn taper as required by the Virginia Department of Transportation to provide safer access to the site. The traffic study found that the impacts of the proposed church on the existing road network are negligible since the majority of traffic will be generated on Sunday during off peak hours.

The proposed church appears to have a minimal impact on traffic and adequate onsite provisions have been provided to accommodate safe access to the site. The applicant should provide a commitment to the trip generation data submitted with the traffic study to ensure that future traffic created by the proposed use of the subject property as a church will not negatively impact the existing road network.

Applicant Response:

The Applicant agrees that the proposed church will have a minimal impact on traffic. The Applicant is willing to commit to the trip generation data submitted with the traffic study, which is based on an approximately 10,646 square foot building and up to 250 seats in the sanctuary.

Parking

The County discourages providing additional impervious surface that exceeds the parking requirements of the Zoning Ordinance (*Revised General Plan, Policy 1, p. 6-30*). The applicant has proposed a capacity of 250 people for the church and has proposed 101 parking spaces.

Staff recommends that provided parking meet, not exceed, what is required by the Zoning Ordinance for the proposed use. Should the applicant require additional parking beyond what is required by the Zoning Ordinance information should be provided demonstrating the need for the additional spaces. If additional spaces are needed for overflow parking, staff recommends that a low-impact parking lot design be considered.

<u>Applicant Response:</u>

In order to maximize the efficiency of the parking area, it has been designed with parking spaces on both sides of the drive aisle in a circular layout that allows a safe and efficient flow through the property. As a result of this design, and to properly serve the capacity of the church, additional parking spaces beyond what is required by the Zoning Ordinance are being provided.

Landscaping and Buffering

The Statement of Justification states that the "applicant will provide the necessary landscaping, buffering and screening to accommodate Zoning Ordinance requirements." The applicant has depicted a 15' buffer yard, as well as the yard and parking setbacks as required by the applicable zoning regulations on the submitted Special Exception plat. The northern and western perimeter of the subject property includes existing evergreens and native deciduous trees which may be used in lieu of the buffer and screening requirements of the Zoning Ordinance. The Special Exception Plat should be revised to depict all of the existing trees which are to be incorporated into the required landscape buffer for the proposed church use on the subject property and should be designated as Tree Conservation Areas (TCAs) on the Special Exception Plat.

Staff recommends that existing trees on the perimeter of the property be incorporated into the landscaping plan for the required buffers on the property and that these existing trees be designated as Tree Conservation Areas (TCAs) on the Special Exception Plat.

Applicant Response:

The Applicant is agreeable to incorporating existing trees in the required buffers into a landscaping plan that is reviewed at the site plan stage of development. Note #12 on the plat has been revised to address the incorporation of these trees.

Noise and Lighting

The proposed use of the subject property as a church has the potential to adversely affect neighboring uses with noise and light emanating from the site. The applicant has committed to providing no outdoor uses that would warrant on-site noise level limitation and has committed to lighting which is in compliance with County standards.

Staff finds that adequate provisions and commitments have been provided to mitigate potential impacts of noise and light trespass on the adjoining properties by the proposed church on the subject property.

Applicant Response:

Comment noted.

RECOMMENDATION

Staff finds that the proposed use of the subject property as a church is consistent with the planned land use for the area and is supported by the rural policies of the <u>Revised General Plan</u>. However, staff has identified a significant outstanding issue pertaining to

the applicant's separate request for a permanent pump-and-haul for the subject property. Resolution of this major issue, prior to moving forward with the legislative application will determine if the utilization of the subject property for the proposed church is viable or if other uses for the property should be considered.

Should the application move forward, staff has identified several other issues that require additional information to be submitted for review so that a more thorough analysis of the proposed project can be completed.

 Reduce parking to only the number of spaces required by the Zoning Ordinance and/or provide information demonstrating the need for the additional spaces if required. If additional spaces are needed for overflow parking, staff recommends a low-impact parking lot design for parking areas.

Applicant Response:

As previously stated, in order to maximize the efficiency of the parking area, it has been designed with parking spaces on both sides of the drive aisle in a circular layout that allows a safe and efficient flow through the property. As a result of this design, and to properly serve the capacity of the church, additional parking spaces beyond what is required by the Zoning Ordinance are being provided.

2. Revise the submitted Special Exception plat to incorporate existing trees into the required buffer yards and designate these trees as Tree Conservation Areas (TCAs) on the Special Exception plat. Provide a commitment to the preservation and maintenance of the TCAs during construction and over the life of the project.

Applicant Response:

As previously stated, the Applicant is agreeable to incorporating existing trees in the required buffers into a landscaping plan that is reviewed at the site plan stage of development. Note #12 on the plat has been revised to address the incorporation of these trees.

LOUDOUN COUNTY HEALTH DEPARTMENT (Joseph E. Lock, Rural Section Supervisor, 2/5/08)

A pump and haul permit (247 SR/P&H 98) was issued to American Produce in 1998. The pump and haul tank was installed in 1999 for the existing use as a warehouse for 31-45 employees to provide sewage disposal facilities which the property was lacking.

The Board of Supervisors voted on December 3, 2001 not to approve the permanent Pump and Haul for Fairfax Church of God/American Produce.

The existing pump and haul is not approved as a permanent pump and haul for the current structure. The facility and pump and haul must be approved for permanent use under the Sewage Handling and Disposal Regulations. (12 VAC 5-610-599.3)

No records exist for the existing well. A well meeting public standards must be applied for and installed if the Special Exception and Permanent Pump and Haul is approved. The actual standards cannot be determined at this time with the limited information provided.

Applicant Response:

As previously stated, the Applicant has worked with the Health Department over the past several months and has received an approved extension of the existing temporary pump and haul permit that was first issued in 1998. The approved pump and haul system will more than sufficiently serve the proposed church's wastewater needs. The approved extension of the temporary pump and haul permit is enclosed as part of this referral response package.

LOUDOUN COUNTY OFFICE OF TRANSPORTATION SERVICES (George Phillips, Sr. Transportation Planner, 2/11/08)

Background

The applicant, Washington Immanuel Presbyterian Church, is requesting special exception approval for church use within an existing building in the A-3 zoning district on a 10 acre site. The applicant has submitted a special exception plat dated January 8, 2008 by TRI-TEK Engineering, a statement of justification dated December 6, 2008 and a traffic study dated November 27, 2007 from Wells & Associates. Based on current 7 th Edition ITE trip rates noted in the traffic study, the proposed development would generate approximately 8 a.m. peak hour, 7 p.m. peak hour, 97 weekday and 383 Sunday vehicle trips. The existing zoning would allow three single family units which would generate approximately 5 a.m. peak hour, 5 p.m. peak hour and 30 daily vehicle trips based on current 7th Edition ITE trip rates.

Existing and Proposed Road Network

The proposed site includes a single private driveway access to Route 621 which is a two lane rural major collector road adjacent to the site. Route 621 serves as an

important connecting road between Leesburg and Route 606. It includes a 21-22 foot wide pavement section with a 55-MPH speed limit in the vicinity of the site. There are no separate turn lanes on Route 621 into the site entrance. Based on the latest available (2006) VDOT traffic counts, the road segment adjacent to the site carries 7,800 annual average daily vehicle trips.

This portion of Route 621 is included in the Countywide Transportation Plan (CTP) as a rural 4 lane median divided major collector road. The CTP calls for this road segment to include 120 feet of right of way, turn lanes at all intersections and to accommodate bicycle/pedestrian facilities. There are currently no VDOT or private sector projects to widen this portion of Route 621.

Transportation Comments

1. The applicant's traffic study indicates that based on turn lane warrants for the weekday peak hour, right and left turn lanes are not warranted into the site entrance. A right turn taper is shown to be warranted and the applicant has reflected this on the plat. The CTP calls for turn lanes at all intersections. However, given that turn lane warrants are not met during the critical weekday a.m. and p.m. peak hours OTS is not recommending them for this particular use. Should additional uses be requested in the future which increase weekday peak hour traffic, however, this would likely change. In addition, please note that VDOT will make the final determination as to whether turn lanes or any other improvements to the entrance are required from the applicant.

Applicant Response:

Comment noted.

2. In keeping with the Countywide Transportation Plan, the applicant's plat shows a 60 foot wide right of way reservation from centerline along the site frontage to accommodate the road widening. Given that a design has not been completed for widening this road segment of Route 621, the 60 feet from centerline shown is acceptable for the planned future widening. In addition, the applicant should reserve an additional 15 feet from the road centerline to accommodate a separate future trail.

Applicant Response:

A future trail could be accommodated in the 20' buffer yard or 35' parking setback. A separate reservation area is unnecessary to accommodate a future trail.

Conclusion/Recommendation

The Office of Transportation Services (OTS) does not have a recommendation at this time. Further discussion of the above issues is needed. OTS staff is available to discuss these issues with the applicant.

VIRGINIA DEPARTMENT OF TRANSPORTATION (Thomas Van Poole, P.E., Senior Transportation Engineer, 3/14/08)

We have reviewed the above application as requested in your January 31, 2008 transmittal (received February 4, 2008). We offer the following comments:

1. We have no objection to the proposed use.

Applicant Response:

Comment noted.

2. We suggest a large (50') radius in lieu of the 180' right turn taper shown on sheet 2.

Applicant Response:

The plat has been revised accordingly.

3. This office does not believe a left turn lane is warranted for this site.

Applicant Response:

Comment noted.

<u>LOUDOUN COUNTY DEPARTMENT OF BUILDING AND DEVELOPMENT – ZONING ADMINISTRATION (Claire Gron, Planner, 3/10/08)</u>

I. APPLICATION SUMMARY

Zoning Administration staff has reviewed the 1st submission of the above-referenced special exception application for conformance with the Revised 1993 Loudoun County Zoning Ordinance ("the Ordinance"). The following items were reviewed as part of the SPEX application:

- (i) A. Information Packet, dated January 31, 2008
- (ii) B. Statement of Justification, dated December 6, 2007
 - C. Plat, dated November 4, 2007, revised through January 14, 2008

This application is a request by Washington Immanuel Presbyterian Church ("the Applicant") for approval of a special exception to permit a church in the A-3 (Agricultural Residential) district. A "Church, synagogue and temple" is permissible by special exception in the A-3 district pursuant to Section 2-403(C).

The property is approximately 10 acres in size, and is zoned A-3 (Agricultural Residential). County records also indicate that Moderately Steep Slopes (15-25%) are present on the property. There appears to be an existing 10,646 sq. ft. warehouse on the property, and two additional structures.

II. SPECIAL EXCEPTION APPLICATION ISSUES:

A. Conformance with the Revised 1993 Loudoun County Zoning Ordinance

1. **Section 2-403(C).** Clarify that the proposed use is "Church, synagogue and temple".

Applicant Response:

The plat has been revised accordingly.

2. **Section 2-404(C).** Include this requirement on Sheet 1.

Applicant Response:

The plat has been revised accordingly.

3. Section 2-404(D) and Section 5-900(A)(10)(a). Clarify that the "75' yard line" shown on Sheet 2 pursuant to §2-404(D) is also a 75 ft. building setback pursuant to §5-900(A)(10)(a).

Applicant Response:

This issue has been clarified through the inclusion of 75' building setback and yard line notes on sheet 2 of the plat.

4. **Section 2-405(A)(2).** The lot coverage stated on Sheet 1 is incorrect. Provide additional details concerning how this figure was derived, and include all structures (including covered porches) on the property.

Applicant Response:

The lot coverage has been revised to include porches. A revised lot coverage is now included on sheet 1 of the plat.

5. Section 5-900(A)(10). Include this requirement on Sheet 1.

Applicant Response:

The plat has been revised accordingly.

6. Section 5-900(C). The Applicant is proposing a new access point to the site off of Evergreen Mills Road (Route 621), which is classified as a major collector per the Countywide Transportation Plan (CTP). Pursuant to §5-900(C), new access points to major collector roads shall be limited to locations at existing median breaks, planned median breaks or other locations approved by Loudoun County or VDOT.

Applicant Response:

The proposed new driveway will improve the safety of access to the property by providing an acceptable sight distance along Evergreen Mills Road. The existing entrance will be removed. Based on the referral comments received from VDOT and OTS, no objections to the newly proposed driveway were raised.

7. Section 5-1102(A)(3). Clarify that 62 parking spaces are required, not 62.5.

Applicant Response:

The plat has been revised accordingly.

8. Section 5-1102(B)(11)(c) and Table 5-1102. Churches are included in the category "Places of Worship" for purposes of calculating required parking (not "Public Assembly") and parking must be provided at the rate of .25/person in

permitted capacity. Clarify if the permitted capacity of the proposed church will be 250, or if the congregation has 250 members. Parking must be provided based on the permitted capacity of the church. Revise the parking requirements on Sheet 1 of the plat accordingly.

Applicant Response:

The proposed church will have a sanctuary capacity of 250 people. The plat has been revised to include this figure. The congregation size may vary depending on the amount of members that join the church.

9. **Section 5-1200.** The proposed sign appears to exceed Table 5-1204(D)(2)(c) maximum size requirements. Remove the sign from the plat. A separate zoning permit is required for the approval of all signs.

Applicant Response:

The plat has been revised accordingly.

10. **Section 5-1413(B)(3).** There shall be a minimum six foot wide landscape island at the end of every row of parking. Revise the plat accordingly.

Applicant Response:

The plat has been revised accordingly.

11. **Table 5-1414(B)(2).** Type II Side buffer yards must be a minimum of 20 ft. and a maximum of 30 ft. in width. Revise the plat accordingly. Be advised that no portion of the parking lot may be located within the buffer yard per §5-1408.

Applicant Response:

The plat has been revised accordingly.

12. **Section 5-1504**. Note on the plans that lighting will comply with §5-1504 standards. Be advised that in the A-3 district, lights shall be shielded so that the direct glare of the bulb is not visible beyond the property line of the parcel.

Applicant Response:

The plat has been revised accordingly.

13. **Section 5-1508.** County records indicate that Moderately Steep Slopes (15-25%) only are present on the property. Verify that Very Steep Slopes (>25%) are present.

Applicant Response:

The plat has been revised to verify that very steep slopes are present.

14. **Section 6-701.** Be advised that a site plan is required for the proposed use.

Applicant Response:

Comment noted.

15. **Section 6-1000.** County records indicate that there is a single 1,426 sq. ft. "miscellaneous improvement" on the property. However, there appears to be a 10,646 sq. ft. warehouse on the property, and two additional structures. Be advised that permits must be obtained for all structures on the property prior to commencement of the church use.

Applicant Response:

Comment noted.

16. **Article 8 definition, "Church, synagogue, temple or mosque."** Provide additional information concerning the existing trailer and the existing 1-story block building on the property. What is the intended use of these structures?

Applicant Response:

The 1-story block building is used as a utility building and the existing trailer will be removed from the property.

B. Plat Comments

The plans submitted contain much more detailed information than is required.
 The Applicant should be advised that a likely condition of approval of the special exception will be the development of the site in substantial conformance with the special exception plat.

Applicant Response:

Comment noted.

 County records indicate that the property owner is as follows: Washington Immanuel Presbyterian Church 10511 Judicial Drive Fairfax, VA 22030-5114

Applicant Response:

Comment noted.

3. Remove the "Existing" land use from Sheet 1.

Applicant Response:

The plat has been revised accordingly.

<u>LOUDOUN COUNTY DEPARTMENT OF BUILDING AND DEVELOPMENT - ENVIRONMENTAL REVIEW TEAM (Laura Edmonds, Environmental Engineer, 3/7/08)</u>

The Environmental Review Team (ERT) reviewed the subject application during the February 26, 2008, ERT Meeting. Our comments pertaining to the current application are as follows:

Regarding streams and wetlands

1) Due to presence of drains, water bodies, hydric soils, and potential wetlands identified by the Loudoun County Wetlands Model on the property and the potential road crossing identified in the application, staff recommends that the applicant perform a wetland delineation verified by the Army Corps of Engineers for the property. Staff further recommends that all identified jurisdictional waters and wetlands be depicted on the Special Exception Plat.

Applicant Response:

The wetlands are now shown on the plat. This portion of the property will not be disturbed through the development of the special exception use.

Regarding steep slopes

2) Staff recommends that the County Steep Slopes layer be used to identify steep slopes on the Special Exception Plat, consistent with FSM 8.102.A.37, which supports the use of County data for identifying areas of steep slopes based upon 5-foot topography.

Applicant Response:

Steep slopes are shown on the plat.

Regarding stormwater management

3) The Statement of Justification (Page 2) indicates that the existing pond will be used to accommodate stormwater runoff. Staff notes that the land disturbance associated with the project will likely exceed the 1-acre threshold whereby water quality measures are required. Furthermore, additional volume would need to be added to the existing pond if it is intended to satisfy water quality requirements. Therefore, staff recommends that the applicant explore opportunities to incorporate separate water quality measures such as bioretention areas to treat runoff from the proposed entrance road/parking area before it enters the pond. Staff further recommends that locations for proposed water quality facilities be identified on the Special Exception Plat.

Applicant Response:

The plat has been revised to include a note addressing the property's Stormwater Management and BMP measures.

Regarding forest resources

4) Staff acknowledges that minimal disturbance to existing vegetation will be required to construct the proposed project. However, staff recommends that the existing forest cover located along the western property boundary be placed within a Tree Conservation Area to ensure preservation of existing vegetation on the property. Staff further recommends that a Condition of Approval ensuring preservation of the designated areas accompany the application.

Applicant Response:

As previously stated, the Applicant is agreeable to incorporating existing trees in the required buffers into a landscaping plan that is reviewed at the site plan stage of development. Note #12 on the plat has been revised to address the incorporation of these trees.

LOUDOUN COUNTY DEPARTMENT OF FIRE, RESCUE, AND EMERGENCY MANAGEMENT (Maria Figueroa, Fire-Rescue Planner, 3/13/08)

Thank you for the opportunity to review the above-captioned application. The Fire and Rescue Planning Staff is not opposed to the application as proposed. However, Staff is of the opinion that the applicant did not adequately addressed Item B of the Issues for consideration in accordance with Section 6-1310 of the Zoning Ordinance. Staff respectfully requests information regarding proposed fire protection systems for the building as the building use changed from a warehouse to an assembly use. Staff understands that this is more of a site plan issue and would be comfortable with a condition of approval that would require the applicant to share that information at that time.

Applicant Response:

The Applicant would be agreeable to a condition of approval stating that this information will be provided at the site plan stage of review. A note addressing fire protection has been added to the plat.

LOUDOUN COUNTY PARKS, RECREATION AND COMMUNITY SERVICES, Brian G. Fuller, Park Planner, 2/4/08)

PRCS has reviewed the referenced application, and offers no objection to its approval based on the material provided.

Additionally, PRCS has previously partnered with faith-based and non-profit organizations in the development of practice ballfields. Staff offers this same opportunity to the Applicant, if interested.

Applicant Response:

While the Applicant appreciates the PRCS partnerships with faith-based and non-profit organizations, the Applicant is not interested in pursuing a partnership at this time.

Please feel free to contact me if you have any questions or comments regarding this referral response.

Sincerely,

WALSH, COLUCCI, LUBELEY, EMRICH & WALSH, P.C.

Michael Romeo, AICP Land Use Planner

Enclosures:

Updated Special Exception Plat

Updated Statement of Justification

Approved Sewage, Occupancy, Fire, and Building/Zoning Permits

CC:

Dr. Jesoon Park, Washington Immanuel Presbyterian Church

Danny Osteen, Tri-Tek Engineering, Inc. Kevin D. Sitzman, Wells + Associates, Inc.